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Attorneys for Defendant
APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RAJA KANNAN,
Plaintiff,
v.
APPLE INC.,
Defendant.

Case No. 5:17-cv-07305-EJD (VKD)

**APPLE INC.'S NOTICE OF
PROPOSED DEADLINE TO
PRODUCE DOCUMENTS PURSUANT
TO SEPTEMBER 25, 2019
DISCOVERY ORDER**

Complaint Filed: December 26, 2017
FAC Filed: May 10, 2018
SAC Filed: October 19, 2018

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Magistrate Judge Virginia K. Demarchi's September 25, 2019 Order re Discovery Motions, Defendant Apple Inc. hereby provides notice that it is unable to fully comply with the October 1, 2019 deadline to produce a report or spreadsheet showing the compensation, stock awards, bonuses, and dividends for each of Mr. Kotni's employees from January 1, 2011 through December 31, 2018, as kept in the ordinary course of business. Apple will produce the aforementioned reports no later than October 7, 2019.

Apple further provides notice that, due to the voluminous number of documents, it is unable to comply with the October 1, 2019 deadline to produce the Options and Awards Summary, the re-redacted bi-weekly pay statements, and documents showing the independent contractor and employee count information for each of Mr. Kotni's employees from January 1, 2011 through December 31, 2018. Apple will produce these documents by no later than October 3, 2019, but will start producing them on October 2, 2019 on a rolling basis.

Dated: October 2, 2019

BAKER & McKENZIE LLP

By: //s// Todd K. Boyer

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APPLE INC.